



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 15, 2024

BY ECF and Email

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Luis Paulino*, 23 Cr. 600 (LAK)

Dear Judge Kaplan:

The parties write respectfully in regard to the above-captioned matter. On Wednesday, March 13, 2024, the Government received from counsel for the defendant a submission in support of a request for terms of a pre-trial resolution of this matter. The Government anticipates completing its evaluation of that submission and hopes to conclude any potential plea negotiations within the next two weeks. The parties jointly request a 30-day adjournment of the status conference scheduled for March 20, 2024.

The Government respectfully requests that the time between today and the next conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the parties an opportunity to continue discussing the possibility of a pretrial resolution of this case. The defendant consents to this request.

MEMO ENDORSEMENT

Application granted. The 3/20/2024 conference is adjourned until 4/16/2024 at 4:00 PM. Any change of plea hearing is referred to the magistrate. Time is excluded from speedy trial calculations through and including 4/16/2024 for the reasons given above.

By:

So Ordered: /s/ Hon. Lewis A. Kaplan
United States District Judge

Dated: 3/15/2024
cc: Martin Cohen, Esq. (by ECF)

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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